

REMARKS

In response to the above-identified Office Action, Claims 1-15 are pending in the application.

For the reasons set forth more fully below, Applicant respectfully submits that the present claims are allowable. Consequently, reconsideration, allowance and passage to issue of the present application are respectfully requested.

Claim Rejections

The Examiner rejected claims 1-15 under 35 U.S.C. 102(b) as being anticipated by Bell. Applicant respectfully disagrees with the rejection.

In the present invention, a system and method help deliver content from a central site to multiple remote sites in a digital media distributor environment. A method and system of synchronizing files between the central site and the plurality of remote sites are disclosed. The method includes providing a list of files to the plurality of remote sites by the central site, prior to a callback time of the remote sites and reporting which of the files are missing by each of the plurality of remote sites to the central site. The method further includes determining within the central site which of the files needs to be sent to each of the plurality of remote sites. (See independent claims 1 and 10.) The system described includes a file system synchronization (FSS) helper application and an automated central site operations (ACSO) mechanism for transmitting the list of files. The system further includes a file system synchronization remote operating mechanism (FSS RSO) in at least one remote site, wherein the FSS RSO mechanism creates a group of files it will need based upon the transmitted files. (See independent claim 7.) Applicant respectfully submits that the present invention is not shown, taught or suggested by the cited art of Bell.

The Bell reference discusses a database synchronization system and method. As disclosed in Bell, the database synchronization synchronizes the content of a central database stored on a central computer with one or more remote databases stored on one or more remote computers. Within a data extract and transfer application on the remote computers is a migrator application that processes audit trail files of the remote computer to create a database of change in the remote computer. When the database of change exceeds a size threshold, the data extract and transfer application shuts down the migrator application, processes the database of change, and restarts the migrator application to begin creation of another database of change. The data and information in the database of change in the remote computer are converted into a series of flat files that are transferred from the remote computer to the central computer. (E.g., see Bell's abstract.)

In rejecting Applicant's invention, the Examiner points to Bell's audit trail as teaching the recited step of providing a list of files to remote sites by a central site. Applicant respectfully disagrees. The audit trail in Bell is formed as a record of the database transactions within the remote computers of Bell (see col. 3, lines 55-57). Applicant fails to see how files formed on a remote computer itself can, in any way, teach, show, or suggest a list of files provided to a remote site from a central site, as recited in Applicant's independent claims 1, 7, and 10. *I note this*

Further, the Examiner contends that Bell's use of the audit trail for rollback of the database to a stable point following corruption of the database is readable on the recited reporting of which of the files are missing by each of the plurality of remote sites to the central site. Applicant fails to see how the use of the audit trail formed within the remote computer for database rollback by the remote computer in Bell teaches or suggests any form of reporting by a remote site to a central site. The act of rollback occurs solely within the remote computer based

upon the audit trail contained solely within the remote computer. Applicant respectfully submits that such teaching wholly fails to read on or remotely suggest the recited reporting of which of the files are missing by each of the plurality of remote sites to the central site.

Additionally, without teaching the reporting of missing files by a remote site to a central site, Applicant respectfully submits that there can be nothing to teach or suggest a determination in the central site of which files are needed in the remote site. While the Examiner points to the transfer of data from the database of change in the remote computer to the central computer as reading on the determination of missing files and the creation of a group of files a remote site will need, there is nothing to teach or suggest that the database of change indicates needed data in the remote computer. Rather, as indicated by its name, the database of change indicates changes to the database that occur in the remote computer. "Database of change 28 is a record of all the updates, additions, or deletions made to the databases on the storage devices 15 during the time period covered by the audit trail files 24 processed by the migrator application 26." (col. 4, lines 21-24) The provision of the database of change from the remote computer to the central computer merely allows the central computer to be synchronized with changes. "To maintain the synchronization of the central database in central computer 16, database of change 28 of each of the remote computers 18 must be transmitted periodically to central computer 16." (col. 4, lines 24-27) Applicant fails to see that there is any form of missing data in the remote computer, since the remote computer performs the tracking of any changes to its databases and subsequently reports such changes to the central computer. Thus, Applicant respectfully submits that there is nothing in Bell to teach or suggest a determination in a central site of which files are needed in a remote site.

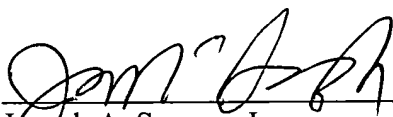
In view of the foregoing, Applicant respectfully submits that Bell wholly fails to teach, show, or suggest the present invention as recited in independent claims 1, 7, and 10. Further, claims 2-6, 8-9, and 11-15 depend directly or indirectly on one of the independent claims 1, 7, and 10, respectively. Therefore, Applicant respectfully submits that these claims, by including the features of an independent claim while adding further features, are not taught, shown, or suggested by the cited art for at least those reasons stated hereinabove. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1-15 under 35 U.S.C. 102(b).

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

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Date



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